

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:

Jaimee Chankia Gatewood
305 Rawlings Hide Lane
Greenville, SC 29605

Debtor(s).

CASE NO: 24-03955-hb
CHAPTER 7

MOTION TO AVOID SECURITY
INTEREST (11 U.S.C. § 522 (f)(1)(B))

TO THE TRUSTEE (if applicable) AND THE SECURED CREDITOR LISTED BELOW:

NAME AND ADDRESS OF CREDITOR AGREEMENT	TYPE OF PROPERTY/DATE OF SECURITY
-------------------------------------------	-----------------------------------

1st Franklin Financial
2537 N Pleasantburg Drive
Greenville, SC 29609

Assorted Household Items

The debtor moves pursuant to 11 U.S.C. § 522(f)(1)(B), to avoid the nonpurchase-money, nonpossessory security interest held by each creditor named above in the property claimed as exempt by the debtor. Each of the undersigned acknowledges reading and understanding Federal Rule of Bankruptcy Procedure 9011.

Date: 11/1/24

Date: 11/1/24

Jaimee C. Gatewood
Debtor

Gina R. McMaster
Gina R. McMaster,
Attorney for Debtor(s)
8 Williams Street
Greenville, South Carolina 29601
(864) 232-1550
District Court No. 6714

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE: Jaimee Chankia Gatewood a/k/a Jaimee C.
Gatewood a/k/a Jaimee Gatewood f/k/a Jaimee
Sullivan

DEBTOR(S)

Address: 305 Rawlings Hide Lane
Greenville, SC 29605

Last four digits of Social-Security or Individual Tax-
Payer-Identification (ITIN) No(s), (if any): 5219

CASE NO: 24-03955-hb

CHAPTER: 7

NOTICE OF MOTION/APPLICATION AND
OPPORTUNITY FOR HEARING

NOTICE OF MOTION TO AVOID LIENS PURSUANT TO 11 U.S.C. 522(f)

The Debtor(s) have filed a Motion to Avoid Liens pursuant to 11 U.S.C. 522(f). A copy of the motion and proposed order accompanies this notice.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to Avoid Liens pursuant to 11 U.S.C. 522(f), or you want the court to consider your views on the motion, then within (21) days of service of this notice, you or your attorney must:

File with the court a written response, return, or objection at:

1100 Laurel Street
Columbia, SC 29201

Responses, returns, or objections filed by an attorney must be electronically filed in ecf.scb.uscourts.gov.

If you mail your response, return, or objection to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also send a copy to:

The McMaster Law Firm, LLC
8 Williams Street
Greenville, SC 29601

Attend the hearing scheduled to be heard on December 4, 2024, at 10:00 a.m./p.m. at the Clement F. Haynsworth Federal Building and US Courthouse, 300 East Washington Street, Greenville, SC 29601.

If no response, return, and/or objection is timely filed and served, no hearing will be held on this motion, except at the direction of the judge.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief prior to the scheduled hearing date, if determined to be appropriate.


s/ Gina R. McMaster

Gina R. McMaster
Attorney for Debtor(s)
8 Williams Street
Greenville, South Carolina 29601
(864) 232-1550
District Court #6714

Dated: 11/1/24

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

IN RE:

**Jaimee Chankia Gatewood
305 Rawlings Hide Lane
Greenville, SC 29605**

Debtor(s)

**CASE NO: 24-03955-hb
CHAPTER 7**

**CERTIFICATE OF SERVICE
BY MAIL**


The undersigned hereby certifies that on this day, (s)he served copies of the **NOTICE OF MOTION/APPLICATION AND OPPORTUNITY FOR HEARING; MOTION TO AVOID SECURITY INTEREST AND PROPOSED ORDER** on the on the following by depositing the same in the United States Mail, postage prepaid, and addressed as follows:

See attached mailing matrix

Further, the undersigned hereby certifies that on this day, she filed the **NOTICE OF MOTION/APPLICATION AND OPPORTUNITY FOR HEARING; MOTION TO AVOID SECURITY INTEREST AND PROPOSED ORDER** with the United States Bankruptcy Court and the Chapter 7 Trustee appointed by the Court will receive electronic notice of the filing of these documents via CM/ECF.

Greenville, South Carolina

11/1/24


Bryan E. Powell, Legal Assistant
Gina R. McMaster
The McMaster Law Firm, L.L.C.
Attorney for Debtor(s)
8 Williams Street
Greenville, SC 29601
(864)232-1550
District Court No. 6714

1st Franklin
2537 N Pleasantburg Dr
Greenville, SC 29609

1st Franklin Financial Corporation
co Myrlen Summer Lee Clevenger
5155 Calhoun Memorial Hwy Suite S-U
Easley, SC 29641